

1 David N. Chandler, Sr. SBN 60780
David N. Chandler, Jr. SBN 235427
2 DAVID N. CHANDLER, p.c.
1747 Fourth Street
3 Santa Rosa, CA 95404
Telephone: (707) 528-4331

4 Attorneys for Debtors

6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA

8 IN RE: CASE No. 17-10828 WJL
9 FLOYD E. SQUIRES, III and CHAPTER 11
10 BETTY J. SQUIRES,
11 Debtors. / MOTION FOR ORDER EXCUSING
TURNOVER BY CUSTODIAN
[11 U.S.C. §523(d)]
12 Date: December 21, 2017
Time: 10:00 a.m.
13 Place: 99 South E St.
Santa Rosa, CA

14
15 Floyd E. Squires, III and Betty J. Squires, Debtors herein,
16 hereby move the above entitled Court for an Order Excusing Turnover
17 by a Custodian, Jeff Smith, Health and Safety Receiver, appointed
18 by the Superior Court, County of Humboldt.

19 Said Motion is made on the grounds that the interests of
20 creditors and equity security holders are better served with the
21 continuation of the services of the receiver pursuant to the terms
22 of appointment.

23 Said Motion is made and based hereon, on the Declarations of
24 Floyd Squires and Jeff Smith, and on the Memorandum of Points and
25 Authorities filed herewith.

26 Dated: 12/14/17

DAVID N. CHANDLER, p.c.

27 By: /s/David N. Chandler
David N. Chandler
28 Attorneys for Debtors